

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

THE STATE OF LOUISIANA, By and through its Attorney General, Elizabeth B. Murrill;
THE STATE OF KANSAS, By and through its Attorney General, Kris W. Kobach;
THE STATE OF OHIO, By and through its Attorney General, Dave Yost; and
THE STATE OF WEST VIRGINIA, By and through its Attorney General, John B. McCuskey,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF COMMERCE;
JEREMY PELTER, in his official capacity as Acting Secretary of Commerce;[†]
BUREAU OF THE CENSUS, an agency within the United States Department of Commerce; and
ROBERT L. SANTOS, in his official capacity as Director of the U.S. Census Bureau,

Defendants.

Case No. 6:25-cv-00076-DCJ-DJA

Judge: Hon. David C. Joseph
Magistrate Judge: Hon. David J. Ayo

**COUNTY OF SANTA CLARA'S MOTION
TO INTERVENE**

[†] Pursuant to Federal Rule of Civil Procedure 25(d), Jeremy Pelter is automatically substituted for his predecessor.

MOTION TO INTERVENE

The County of Santa Clara (“County”), by and through its undersigned counsel, hereby respectfully moves to intervene as a defendant in this matter as of right pursuant to Rule 24(a) of the Federal Rules of Civil Procedure; or, in the alternative, for permissive intervention pursuant to Rule 24(b). The County’s motion is based on this Motion; the Memorandum filed herewith; the accompanying declarations; this Court’s file; and any other matters properly before the Court.

Pursuant to Rule 7.6 of the Local Civil Rules, counsel for the County hereby states that the County has presented its proposed Answer to the Complaint to all parties who have an interest to oppose, and that Plaintiffs oppose the instant Motion; Hannah Victoria Morgan, Carrie Nicolas, Lucia Ornelas, Gabriel Reiss, and Veronica Zavala (the “Proposed Voter Intervenors”) do not oppose the instant Motion; and Defendants were asked whether they consented to the relief sought in this motion but did not provide an answer as of the time of filing.

Dated: February 14, 2025

Respectfully submitted,

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COUNTY OF SANTA CLARA

* *Motion forthcoming for admission pro hac vice*

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